Federal Defenders OF NEW YORK, INC.

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August 10, 2020

BY E-MAIL & ECF

Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

MEMO ENDORSED

Re: <u>United States v. Garrett Kelsey</u>

19 Cr. 886 (SHS)

Dear Judge Stein:

Cc:

I write, with the consent of the government and Pretrial Services, to request that the Court modify Garrett Kelsey's bail conditions and permit him to relocate to a new address immediately, on the condition that he maintain such residence and not relocate further without his supervising officers' prior approval.

As a condition of Mr. Kelsey's bail, the Court ordered him to continue residing with his father until he received the Court's authorization to relocate. Minute Entry at ECF No. 21. On July 9, 2020, this Court gave Mr. Kelsey permission to leave his father's residence on pre-approved dates and times to search for and obtain a new home. ECF No. 45. As of this date, Mr. Kelsey's search for a new permanent address has turned up some strong leads, but it remains ongoing. In the interim, Mr. Kelsey respectfully requests permission to relocate to the temporary address of a close friend, which has already been approved by Pretrial Services:

This move is necessary because the owner of Mr. Kelsey's father's address, Mr. Kelsey's father's romantic partner, is contemplating a change in her relationship with Mr. Kelsey's father and has told Mr. Kelsey to leave her home.

Moving forward, and with the consent of Pretrial Services, Mr. Kelsey respectfully requests that the Court modify his bail conditions and order him to "maintain residence and not relocate without prior approval of Pretrial Services."

Respectfully Submitted,

/s/

Andrew J. Dalack Assistant Federal Defender (212) 417-8768

Application granted.

AUSA Stephanie L. Lake Supervising Officer Jonathan Lettieri Supervising Officer Cody Jonker

Dated: New York, New York August 11, 2020 SO ORDERED

U.S.D.J.